

RECEIVED

FEB 02 2013

Utah Department of Commerce
Division of Securities

J. Kent Holland #1520
J KENT HOLLAND, P.C.
Attorney for Respondents
P.O. Box 902278
Sandy, Utah 84090-2278
Telephone: (801)- 738-3181
jkhollandlaw@yahoo.com

BEFORE THE DIVISION OF SECURITIES
OF THE DEPARTMENT OF COMMERCE
OF THE STATE OF UTAH

IN THE MATTER OF:)	
)	
PATENT HOLDING, LLC,)	ANSWER TO ORDER TO SHOW
STEVEN LYNN BOWERS and)	CAUSE
PAT G. MINER.)	
)	Docket Nos.: SD-09-0056
)	SD-09-0057
)	SD-09-0058
Respondents)	
)	

COMES NOW the Respondents, Patent Holding, LLC and Steven Lynn Bowers, hereinafter referred to as "Respondents", by and through their attorney of record, J. Kent Holland, answer the Order to Show Cause as follows:

FIRST DEFENSE

The Order to Show Cause fails to state a claim upon which relief may be granted.

SECOND DEFENSE

1. In answering paragraph 1 of the Order to Show Cause, Respondents cannot confirm or deny and therefore must **deny** the same.
2. In answering paragraph 2 of the Order to Show Cause, Respondents **admit**.
3. In answering paragraph 3 of the Order to Show Cause, Respondents **admit**.
4. In answering paragraph 4 of the Order to Show Cause, Respondents cannot confirm or deny and therefore must **deny** the same.
5. In answering paragraph 5 of the Order to Show Cause, Respondents **deny** the same.
6. In answering paragraph 6 of the Order to Show Cause, Respondents **deny** the same.
7. In answering paragraph 7 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
8. In answering paragraph 8 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
9. In answering paragraph 9 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.

10. In answering paragraph 10 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
11. In answering paragraph 11 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
12. In answering paragraph 12 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
13. In answering paragraph 13 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
14. In answering paragraph 14 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
15. In answering paragraph 15 of the Order to Show Cause, Respondents **admit** the same.
16. In answering paragraph 16 of the Order to Show Cause, Respondents **admit** b., c., d., f., g., h. and m. **Deny** a., e., i., j., k., and l.
17. In answering paragraph 17 of the Order to Show Cause, Respondents **admit** a., and e. **Deny** b., c., and d.
18. In answering paragraph 18 of the Order to Show Cause, Respondents **deny** the same.

19. In answering paragraph 19 of the Order to Show Cause, Respondents **admit** the same.
20. In answering paragraph 20 of the Order to Show Cause, Respondents **admit** the same.
21. In answering paragraph 21 of the Order to Show Cause, Respondents **admit** the same.
22. In answering paragraph 22 of the Order to Show Cause, Respondents **admit** the same.
23. In answering paragraph 23 of the Order to Show Cause, Respondents cannot confirm or deny a. and therefore must **deny**. **Admit** b only that he purchased a ranch., c., e., i, and j. **Deny** d. f. g, and h.
24. In answering paragraph 24 of the Order to Show Cause, Respondents **admit** c. **Deny** a., b., d. and e.
25. In answering paragraph 25 of the Order to Show Cause, Respondents **admit** the same.
26. In answering paragraph 26 of the Order to Show Cause, Respondents **admit** that a check was delivered to Bowers.
27. In answering paragraph 27 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
28. In answering paragraph 28 of the Order to Show Cause, Respondents **admit** the same.

29. In answering paragraph 29 of the Order to Show Cause, Respondents **admit** the same.
30. In answering paragraph 30 of the Order to Show Cause, Respondents **admit** the same.
31. In answering paragraph 31 of the Order to Show Cause, Respondents **deny** the same.
32. In answering paragraph 32 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
33. In answering paragraph 33 of the Order to Show Cause, Respondents cannot confirm or deny the allegations contained therein and therefore must **deny** the same.
34. In answering paragraph 34 of the Order to Show Cause, Respondents incorporate and reallege their answers to paragraphs 1 through 33 as though fully set forth.
35. In answering paragraph 35 of the Order to Show Cause, Respondents **deny** the same.
36. In answering paragraph 36 of the Order to Show Cause, Respondents **deny** the same.
37. In answering paragraph 37 of the Order to Show Cause, Respondents **deny** the same.
38. In answering paragraph 38 of the Order to Show Cause, Respondents **deny** the same.

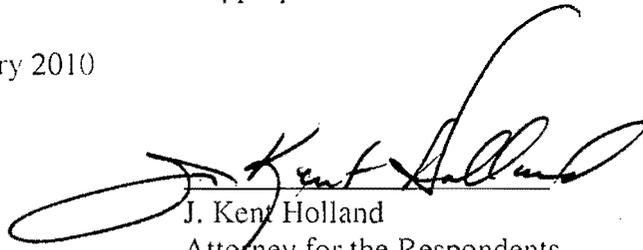
THIRD DEFENSE

As a further defense, Respondents allege lack of jurisdiction, release, accord and satisfaction, failure of consideration, lack of consideration, waiver, estoppel, doctrine of laches, statute of limitations, statute of fraud and election of remedies, some or all.

WHEREFORE, Respondents pray as follows:

1. That the Order to Show Cause be dismissed;
2. That no fines be assessed against Respondents
3. For such other and further relief that is appropriate.

DATED this 29th day of January 2010


J. Kent Holland
Attorney for the Respondents
Patent Holding, LLC and
Stephen Lynn Bowers

MAILING CERTIFICATE

I hereby certify that a true and correct copy of the foregoing
DEFENDANTS' ANSWER TO ORDER TO SHOW CAUSE was mailed this
1st day of February 2010 to the following:

Division of Securities
UTAH Department of Commerce
160 East 300 South, 2nd Floor
Box 146760
Salt Lake City, Utah 84114-6760
